

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A.;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A. RETIREMENT	)	
ACCOUNT FUND;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A. PENSION FUND;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	CIVIL ACTION
LOCAL UNION NO. 93 U.A. HEALTH AND	)	
WELFARE FUND;	)	
BOARD OF TRUSTEES of the JOINT	)	NO. 08-C-3254
APPRENTICESHIP COMMITTEE FUND of the	)	
PLUMBING & HEATING INDUSTRY OF LAKE	)	
AND McHENRY COUNTIES; and	)	JUDGE: LEFKOW
The INDUSTRY ADVANCEMENT FUND;	)	
	)	
Plaintiffs,	)	MAGISTRATE JUDGE: VALDEZ
	)	
vs.	)	
	)	
HIGH-TECH MECHANICAL, INC.,	)	
an Illinois Corporation; and	)	
TOM BLANCHETTE,	)	
an individual,	)	
	)	
Defendants.	)	

**MOTION FOR DEFAULT JUDGMENT**

Now come Plaintiffs, the BOARD OF TRUSTEES of the PLUMBERS LOCAL UNION NO. 93 U.A., *et al.*, by and through their attorneys, JOHNSON & KROL, LLC, and moves this Honorable Court for entry of Default Judgment in favor of Plaintiffs and against Defendant HIGH-TECH MECHANICAL. INC., (“HIGH-TECH”) and TOM BLANCHETTE (“BLANCHETTE”) pursuant to Rule 55(b) of the Federal Rules of Civil Procedure and in support thereof, states as follows:

1. On June 6, 2008, Plaintiffs filed their Initial Complaint in the above-captioned matter.
2. On June 13, 2008, copies of the Summons and Complaint were served upon HIGH-TECH

- via corporate service by leaving a true and correct copy of said documents with BLANCHETTE, the head project manager of HIGH-TECH. (Affidavit of Service attached as Exhibit 1).
3. On that same day, copies of the Summons and Complaint were served upon BLANCHETTE via personal service by handing a true and correct copy of said documents to Defendant BLANCHETTE. (Affidavit of Service attached as Exhibit 2).
  4. The Defendants did not file an Answer or otherwise respond to the Complaint within 20 days of June 13, 2008, the date the Defendants were served with the Summons and Complaint (Fed. R. Civ. P. 12(a)(3)).
  5. This case involves unpaid contributions and wage deductions. (Plaintiffs' Complaint ¶ 7).
  6. The amount of contributions and wage deductions due and owing to the Plaintiffs is determined by the number of hours worked by covered employees under the Collective Bargaining Agreement and Trust Agreements. (Plaintiffs Complaint ¶ 7).
  7. Defendant HIGH-TECH failed to submit contributions for the period of September 1, 2007 through February 29, 2008, resulting in outstanding contributions, liquidated damages, and interest charges in the amount of \$12,850.00. (Affidavit of Lyman Behrens attached as Exhibit 3).
  8. Thereafter, Defendants HIGH-TECH and BLANCHETTE signed a Settlement Agreement with the Trust Funds wherein Defendant BLANCHETTE agreed to be personally liable for the obligations of HIGH-TECH.
  9. Defendants HIGH-TECH and BLANCHETTE have failed to make any payments toward the unpaid contributions, liquidated damages or interest, and therefore the entire amount of \$12,850.00 remains unpaid.
  10. Defendants HIGH-TECH and BLANCHETTE currently owe the Plaintiffs reasonable

attorney's fees and costs in the amount of \$3,822.50 for the period of February 11, 2008 through the present. (Affidavit of William P. Callinan attached as Exhibit 4).

11. The Court may render a Default Judgment against a party who has not filed a responsive pleading or otherwise defended the suit. (Fed. R. Civ. P. 55(a)(b)(2)).
12. The total principal balance due and owing to the Plaintiffs including contributions, liquidated damages, interest and attorney's fees is \$16,672.50. (Affidavit of Lyman Behrens attached as Exhibit 3).
13. Plaintiffs respectfully request this Honorable Court enter Default Judgment in favor of Plaintiffs and against the Defendants in the amount of \$16,672.50.
14. A draft Default Judgment Order is attached hereto as Exhibit 5.

WHEREFORE, Plaintiffs pray that this Honorable Court enter an Order of Default Judgment in favor of Plaintiffs and against Defendants HIGH-TECH and BLANCHETTE in the amount of \$16,672.50.

Respectfully submitted,

JOHNSON & KROL, LLC

By: /s/ William P. Callinan - 6292500  
One of Plaintiffs' Attorneys

William P. Callinan  
ATTORNEY FOR PLAINTIFFS  
Johnson & Krol, LLC  
208 South LaSalle Street, Suite 1602  
Chicago, Illinois 60604  
(312) 372-8587

AO 440 (Rev. 05/00) Summons in a Civil Action.

## RETURN OF SERVICE

Service of the Summons and complaint was made by me <sup>(1)</sup>	DATE <u>6/13/08 at 2:29 pm</u>
NAME OF SERVER (PRINT) <u>TERRANCE DUBOIS</u>	TITLE <u>PRIVATE INVESTIGATOR</u>
Check one box below to indicate appropriate method of service	

☐ Served personally upon the defendant. Place where served: \_\_\_\_\_

☐ Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: \_\_\_\_\_

☐ Returned unexecuted: \_\_\_\_\_

☒ Other (specify): CORPORATE SERVICE TO TOM BLANCHETTE, PRESIDENT  
TOM BLANCHETTE WAS SERVED AT 296 S. KINZIE AVE BRADLEY, IL  
TOM BLANCHETTE IS A WHITE MALE AGE 58, APPROXIMATELY 5'10"  
MEDIUM BUILD, APPROXIMATELY 190 lbs and Brown Hair.

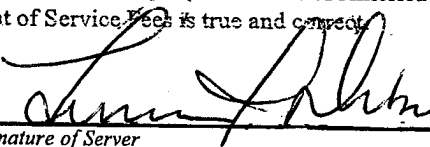
## STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL

## DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on 6/13/08  
Date

  
Signature of Server

PO Box 581 CUFTON, IL 60927  
Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

EXHIBIT

1

AO 440 (Rev. 05/00) Summons in a Civil Action.

## RETURN OF SERVICE

Service of the Summons and complaint was made by me <sup>(1)</sup>	DATE 6/13/08 at 2:29 pm
NAME OF SERVER (PRINT) TERRANCE DUBOIS	TITLE PRIVATE INVESTIGATOR

Check one box below to indicate appropriate method of service

☒ Served personally upon the defendant. Place where served: 296 S. KINZIE AVE BRADLEY, IL  
TONY BLANCHETTE 1SA white male age 58, approximately 5'10", medium build,  
 approximately 190 lbs. and brown hair.

☐ Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: \_\_\_\_\_

☐ Returned unexecuted: \_\_\_\_\_

☐ Other (specify): \_\_\_\_\_

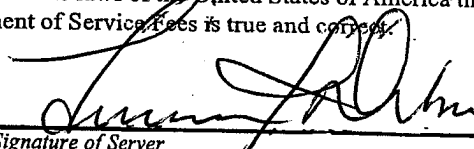
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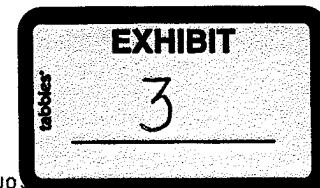
2

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A.;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A. RETIREMENT	)	
ACCOUNT FUND;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A. PENSION FUND;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	CIVIL ACTION
LOCAL UNION NO. 93 U.A. HEALTH AND	)	
WELFARE FUND;	)	
BOARD OF TRUSTEES of the JOINT	)	NO. 08-C-3254
APPRENTICESHIP COMMITTEE FUND of the	)	
PLUMBING & HEATING INDUSTRY OF LAKE	)	
AND McHENRY COUNTIES; and	)	JUDGE: LEFKOW
The INDUSTRY ADVANCEMENT FUND;	)	
	)	
Plaintiffs,	)	MAGISTRATE JUDGE: VALDEZ
	)	
vs.	)	
	)	
HIGH TECH MECHANICAL, INC.,	)	
an Illinois Corporation; and	)	
TOM BLANCHETTE,	)	
an individual,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF LYMAN BEHRENS**

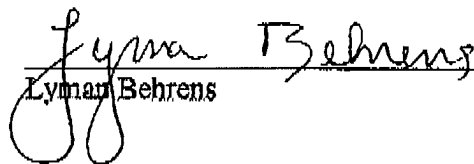
I, Lyman Behrens, hold the title of Benefit Funds Manager for the PLUMBERS LOCAL UNION NO.93 U.A. RETIREMENT ACCOUNT FUND; PLUMBERS LOCAL UNION NO.93 U.A. PENSION FUND; PLUMBERS LOCAL UNION NO.93 U.A. HEALTH AND WELFARE FUND; JOINT APPRENTICESHIP COMMITTEE FUND of the PLUMBING & HEATING INDUSTRY OF LAKE AND McHENRY COUNTIES; (hereinafter referred to as "Trust Funds"). Being first duly sworn and upon oath state that to the best of my knowledge the following is an accurate statement as to Defendant HIGH-TECH's and BLANCHETTE's



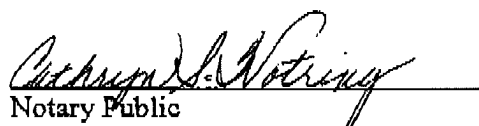
delinquency in the above captioned matter;

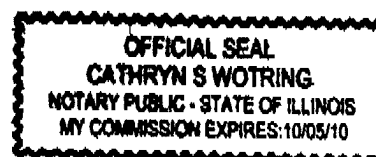
1. Defendant HIGH-TECH failed to submit contributions for the period of September 1, 2007 through February 29, 2008, resulting in outstanding contributions, liquidated damages, and interest charges in the amount of \$12,850.00.
2. On or about April 1, 2008, the Trust Funds entered into a Settlement Agreement with Defendants HIGH-TECH, and BLANCHETTE personally.
3. The terms of the Settlement Agreement required HIGH-TECH and BLANCHETTE to pay off the principal balance of \$12,850.00 over a 6 month period, and provided that BLANCHETTE shall be individually liable for all of the obligations of Defendant HIGH-TECH.
4. Defendants HIGH-TECH and BLANCHETTE have failed to make any payments under the Settlement Agreement and therefore the entire amount of \$12,850.00 remains unpaid.
5. Defendants currently owe the Plaintiffs reasonable attorney fees and costs in the amount of \$3,822.50 for the period of February 11, 2008 through the present.
6. The total principal balance due and owing to the Plaintiffs including contributions, liquidated damages, interest and attorney's fees is \$16,672.50.

Further affiant saith not.

  
Lyman Behrens

Subscribed and sworn  
Before me this 9  
day of July, 2008.

  
Notary Public

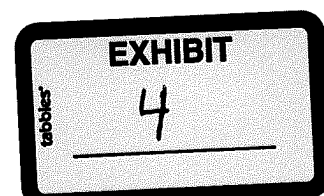


**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BOARD OF TRUSTEES of the PLUMBERS	)	
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LOCAL UNION NO. 93 U.A. HEALTH AND	)	
WELFARE FUND;	)	
BOARD OF TRUSTEES of the JOINT	)	NO. 08-C-3254
APPRENTICESHIP COMMITTEE FUND of the	)	
PLUMBING & HEATING INDUSTRY OF LAKE	)	
AND McHENRY COUNTIES; and	)	JUDGE: LEFKOW
The INDUSTRY ADVANCEMENT FUND;	)	
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Plaintiffs,	)	MAGISTRATE JUDGE: VALDEZ
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vs.	)	
	)	
HIGH-TECH MECHANICAL, INC.,	)	
an Illinois Corporation; and	)	
TOM BLANCHETTE,	)	
an individual,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF WILLIAM P. CALLINAN  
IN SUPPORT OF ATTORNEY'S FEES AND COSTS**

I, William P. Callinan, hold the title of Associate Attorney at the law firm of Johnson & Krol, LLC. Being first duly sworn, on oath deposes and states that to the best of my knowledge, the following is an accurate statement as to the attorney's fees and costs the Plaintiffs have incurred in the above-captioned matter:





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Listing

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## Selection Criteria

Refe.Selection Include: High Tech Mechanical, Inc.

## Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
27132	TIME			JEM	0.17	210.00	35.70
	2/11/2008			tc	0.00	T@1	
	Billed	G:11602	2/20/2008	93 TF	0.00		
			Telephone conf. w/collection referral.	High Tech Mechanical, In	0.00		
27135	TIME			JEM	0.50	210.00	105.00
	2/12/2008			Research	0.00	T@1	
	Billed	G:11602	2/20/2008	93 TF	0.00		
			Search: IL corporate search w/state; Draft demand letter to contractor.	High Tech Mechanical, In	0.00		
27235	TIME			WPC	0.17	185.00	31.45
	2/13/2008			Status	0.00	T@1	
	Billed	G:11602	2/20/2008	93 TF	0.00		
			Status: add company to report; Calendar expiration date give on demand letter.	High Tech Mechanical, In	0.00		
27560	TIME			JEM	0.33	210.00	69.30
	2/26/2008			tc	0.00	T@1	
	Billed	G:11637	3/18/2008	93 TF	0.00		
			Telephone conf. w/contractor; Memo to file.	High Tech Mechanical, In	0.00		
27798	TIME			WPC	0.50	185.00	92.50
	2/27/2008			Review	0.00	T@1	
	Billed	G:11637	3/18/2008	93 TF	0.00		
			Review incoming correspondence from contractor; Conf. w/Joe.	High Tech Mechanical, In	0.00		
27566	TIME			JEM	0.33	210.00	69.30
	2/27/2008			Review	0.00	T@1	
	Billed	G:11637	3/18/2008	93 TF	0.00		
			Review correspondence from contractor; Conf w/Will.	High Tech Mechanical, In	0.00		
27815	TIME			WPC	0.33	185.00	61.05
	2/29/2008			Review	0.00	T@1	
	Billed	G:11637	3/18/2008	93 TF	0.00		
			Review correspondence; T/C to contractor.	High Tech Mechanical, In	0.00		
27835	TIME			WPC	0.17	185.00	31.45
	3/4/2008			tc w/contrac	0.00	T@1	
	Billed	G:11637	3/18/2008	93 TF	0.00		
			Tel. conf. with contractor.	High Tech Mechanical, In	0.00		
27840	TIME			WPC	1.67	185.00	308.95
	3/5/2008			tc	0.00	T@1	
	Billed	G:11637	3/18/2008	93 TF	0.00		
			Telephone conf. w/Tom B from High Tech; Draft settlement agreement & calculate delinquency; Received & reviewed Jan & Feb contribution reports.	High Tech Mechanical, In	0.00		

6/30/2008

Johnson &amp; Krol, LLC

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Listing

Page 2

Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status		Activity	DNB Time	Rate Info	
Description		Client	Est. Time	Bill Status	
		Reference	Variance		
27848	TIME	WPC	0.67	185.00	123.95
3/6/2008		complete	0.00	T@1	
Billed	G:11637	93 TF	0.00		
Complete drafting settlement agreement; Draft payment schedule; T/C with Lyman @ fund office.	3/18/2008	High Tech Mechanical, In	0.00		
28072	TIME	JEM	0.17	210.00	35.70
3/6/2008		Review	0.00	T@1	
Billed	G:11637	93 TF	0.00		
Begin to review/edit settlement agreement for Will.	3/18/2008	High Tech Mechanical, In	0.00		
28078	TIME	JEM	0.67	210.00	140.70
3/10/2008		complete	0.00	T@1	
Billed	G:11637	93 TF	0.00		
Complete review/edit settlement agreement for Will; Conf. w/Will; Revise amortization schedule.	3/18/2008	High Tech Mechanical, In	0.00		
27867	TIME	WPC	1.00	185.00	185.00
3/10/2008		Revise	0.00	T@1	
Billed	G:11637	93 TF	0.00		
Revisions to settlement agreement; Draft security agreement; Draft letter w/settlement agreements.	3/18/2008	High Tech Mechanical, In	0.00		
28835	TIME	WPC	1.00	185.00	185.00
4/4/2008		Review	0.00	T@1	
Billed	G:11676	93 TF	0.00		
Review correspondence from company; Draft letter to Lyman with settlement agreement & first payment; Draft letter to Lynn with Settlement Agreement.	4/18/2008	High Tech Mechanical, In	0.00		
28214	TIME	JEM	0.33	210.00	69.30
4/4/2008		Conference	0.00	T@1	
Billed	G:11676	93 TF	0.00		
Conference w/WPC Re: Settlement Agreement	4/18/2008	High Tech Mechanical, In	0.00		
28313	EXP	J&K	1	21.00	21.00
4/7/2008		UCC State			
Billed	G:11676	93 TF			
U.C.C. Financing Statement filed with Secretary of State.	4/18/2008	High Tech Mechanical, In			
28288	TIME	WPC	0.83	185.00	153.55
4/7/2008	12:59 PM	Draft	0.00	T@1	
Billed	G:11676	93 TF	0.00		
Draft UCC Form 1 Statement	4/18/2008	High Tech Mechanical, In	0.00		
File UCC Form 1 filing statement					
t/c with High Tech					
29029	TIME	WPC	0.50	185.00	92.50
4/16/2008		tc	0.00	T@1	
Billed	G:11702	93 TF	0.00		
Telephone conference with Fund Office	5/20/2008	High Tech Mechanical, In	0.00		
Draft letter to Fund					
Fax letter					

6/30/2008

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Johnson &amp; Krol, LLC

Listing

Page 3

Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status		Activity	DNB Time	Rate Info	
Description		Client	Est. Time	Bill Status	
		Reference	Variance		
29074	TIME	WPC	0.17	185.00	31.45
4/17/2008		tc	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
Telephone conference with Fund Office regarding Settlement		High Tech Mechanical, In	0.00		
29364	TIME	JEM	0.17	210.00	35.70
4/25/2008		Conference	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
Conference with WPC Re: status of Settlement Agreement and contractor's bond		High Tech Mechanical, In	0.00		
29367	TIME	WPC	0.17	185.00	31.45
4/25/2008		Conference	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
Conference with JEM regarding possible bond claim		High Tech Mechanical, In	0.00		
29384	TIME	JEM	0.17	210.00	35.70
4/28/2008		Conference	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
Conference with WPC Re: delinquency and potential bond claim		High Tech Mechanical, In	0.00		
29577	TIME	JEM	0.17	210.00	35.70
5/5/2008		tc client	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
Tel. conf. with fund office Re: returned check		High Tech Mechanical, In	0.00		
29660	TIME	WPC	0.33	185.00	61.05
5/7/2008		tc	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
Telephone conference with Contractor regarding bounced settlement check and missing settlement payment		High Tech Mechanical, In	0.00		
29999	TIME	WPC	0.33	185.00	61.05
5/15/2008		tc	0.00	T@1	
Billed	G:11702	5/20/2008 93 TF	0.00		
Telephone conference with Contractor regarding missing settlement payments and bounced check; Discussion on possible payment options.		High Tech Mechanical, In	0.00		
30197	TIME	WPC	0.17	185.00	31.45
5/20/2008		tc	0.00	T@1	
WIP		93 TF	0.00		
Telephone conference with Contractor		High Tech Mechanical, In	0.00		
30307	TIME	JEM	0.17	210.00	35.70
5/22/2008		Conference	0.00	T@1	
WIP		93 TF	0.00		
Conference with WPC Re: filing suit		High Tech Mechanical, In	0.00		
30345	TIME	WPC	0.67	185.00	123.95
5/23/2008		Continue	0.00	T@1	
WIP		93 TF	0.00		
Continue drafting Complaint		High Tech Mechanical, In	0.00		
Letter to Contractor					
Telephone conference with Contractor					

6/30/2008

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Johnson &amp; Krol, LLC

Listing

Page 4

Slip ID	Dates and Time	Timekeeper Activity	Units DNB Time	Rate Rate Info	Slip Value
Posting Status	Description	Client Reference	Est. Time	Bill Status	
			Variance		
30397	TIME	WPC	1.33	185.00	246.05
5/27/2008		Draft	0.00	T@1	
WIP		93 TF	0.00		
	Draft Complaint against High-Tech Mechanical	High Tech Mechanical, In	0.00		
	Telephone conference with Fund Office				
30398	TIME	WPC	0.50	185.00	92.50
5/27/2008		Draft	0.00	T@1	
WIP		93 TF	0.00		
	Draft letter to Fund Office with Settlement Agreements	High Tech Mechanical, In	0.00		
	Email correspondence with Fund Office				
30600	TIME	WPC	0.50	185.00	92.50
6/3/2008		e-mail	0.00	T@1	
WIP		93 TF	0.00		
	E-mail correspondence with Fund office.	High Tech Mechanical, In	0.00		
	Telephone conference with Fund office.				
	Continue drafting complaint				
30645	TIME	WPC	0.67	185.00	123.95
6/4/2008		Review	0.00	T@1	
WIP		93 TF	0.00		
	Review correspondence from Fund office	High Tech Mechanical, In	0.00		
	Revise and finalize the Complaint and exhibits				
30679	TIME	WPC	1.67	185.00	308.95
6/5/2008		Draft	0.00	T@1	
WIP		93 TF	0.00		
	Draft Summons and Civil Cover Sheet	High Tech Mechanical, In	0.00		
	Revise Complaint per Conference with JEM				
	Scan and Efile Complaint and Exhibits				
30673	TIME	JEM	0.17	210.00	35.70
6/5/2008		Conference	0.00	T@1	
WIP		93 TF	0.00		
	Conference with WPC	High Tech Mechanical, In	0.00		
30670	TIME	JEM	0.67	210.00	140.70
6/5/2008		Review	0.00	T@1	
WIP		93 TF	0.00		
	Review and revise Complaint	High Tech Mechanical, In	0.00		
30690	TIME	Clerk - JAK	0.42	80.00	33.60
6/6/2008	10:15 AM	Draft	0.00	T@1	
WIP		93 TF	0.00		
	Draft letter to process server and prepare documents for service.	High Tech Mechanical, In	0.00		
30774	TIME	WPC	0.17	185.00	31.45
6/9/2008		Review	0.00	T@1	
WIP		93 TF	0.00		
	Review Court correspondence	High Tech Mechanical, In	0.00		
	Conference with JEM				

6/30/2008  
2:34 PMJohnson & Krol, LLC  
Listing

Page 5

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
31073	TIME	WPC	0.17	185.00	31.45
6/13/2008		tc	0.00	T@1	
WIP		93 TF	0.00		
Telephone conference with Contractor regarding pending lawsuit (x2)		High Tech Mechanical, In	0.00		
31291	TIME	WPC	0.33	185.00	61.05
6/20/2008		tc	0.00	T@1	
WIP		93 TF	0.00		
Telephone conference with contractor regarding payment of delinquencies review correspondence from Contractor		High Tech Mechanical, In	0.00		
31333	TIME	Clerk - JAK	0.25	80.00	20.00
6/23/2008		Court file	0.00	T@1	
WIP		93 TF	0.00		
Court Filing: affidavits of service for High Tech and Blanchette.		High Tech Mechanical, In	0.00		
31416	TIME	WPC	0.50	185.00	92.50
6/24/2008		tc	0.00	T@1	
WIP		93 TF	0.00		
Telephone conference with Contractor regarding mechanics liens review correspondence from Contractor Research regarding enforcement of Mechanics liens (subrogation rights)		High Tech Mechanical, In	0.00		
31500	EXP	J&K	1	125.00	125.00
6/24/2008		Process Service			
WIP		93 TF			
Process Service Fee: to High Tech and Tom Blanchette on 6/13/08		High Tech Mechanical, In			
31553	TIME	WPC	0.50	185.00	92.50
6/27/2008		Draft	0.00	T@1	
WIP		93 TF	0.00		
Draft Motion for Default Judgment		High Tech Mechanical, In	0.00		
Grand Total					
			Billable	19.71	3822.50
			Unbillable	0.00	0.00
			Total	19.71	3822.50

Total Attorneys' Fees to Date = \$3,822.50

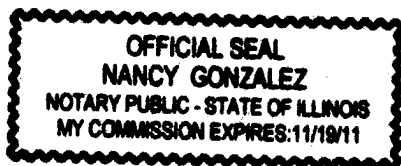
GRAND TOTAL = \$3,822.50

Further, the affiant saith not.

Subscribed and sworn  
Before me this 7<sup>th</sup> day of  
July, 2008.

Nancy Gonzalez  
Notary Public

William P. Callinan  
Mr. William P. Callinan



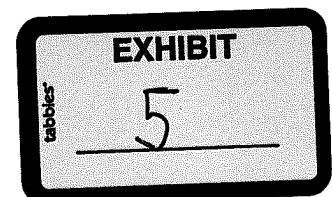
**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A.;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A. RETIREMENT	)	
ACCOUNT FUND;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	
LOCAL UNION NO. 93 U.A. PENSION FUND;	)	
BOARD OF TRUSTEES of the PLUMBERS	)	CIVIL ACTION
LOCAL UNION NO. 93 U.A. HEALTH AND	)	
WELFARE FUND;	)	
BOARD OF TRUSTEES of the JOINT	)	NO. 08-C-3254
APPRENTICESHIP COMMITTEE FUND of the	)	
PLUMBING & HEATING INDUSTRY OF LAKE	)	
AND McHENRY COUNTIES; and	)	JUDGE: LEFKOW
The INDUSTRY ADVANCEMENT FUND;	)	
	)	
Plaintiffs,	)	MAGISTRATE JUDGE: VALDEZ
	)	
vs.	)	
	)	
HIGH-TECH MECHANICAL, INC.,	)	
an Illinois Corporation; and	)	
TOM BLANCHETTE,	)	
an individual,	)	
	)	
Defendants.	)	

**DEFAULT JUDGMENT ORDER**

Default Judgment is hereby entered in favor of Plaintiffs and against Defendants HIGH-TECH MECHANICAL, INC ("HIGH-TECH") and TOM BLANCHETTE ("BLANCHETTE") as follows:

1. Default Judgment is entered in favor of Plaintiffs and against Defendants HIGH-TECH and BLANCHETTE jointly and severally.
2. Defendants HIGH-TECH and BLANCHETTE are jointly and severally ordered to pay to Plaintiffs all known unpaid contributions, liquidated damages and interest that accrued



during the period of September 1, 2007 through the February 29, 2008 in the amount of \$12,850.00.

3. Defendants HIGH-TECH and BLANCHETTE are jointly and severally ordered to pay to Plaintiffs reasonable attorney's fees and costs incurred by the Plaintiffs in the amount of \$3,822.50 pursuant to the Collective Bargaining Agreement, Trust Agreements and 29 U.S.C. § 1132 (g)(2)(D).
4. The total principal balance due and owing to the Plaintiffs from Defendants HIGH-TECH and BLANCHETTE is \$16,672.50.
5. That the Plaintiffs have such other relief as the Court may deem just and equitable all at Defendant's cost, pursuant to 29 U.S.C. § 1132(g)(2)(E).

ORDERED BY:

\_\_\_\_\_  
HONORABLE JUDGE LEFKOW

Dated: \_\_\_\_\_